

December 21, 2013

Mr. Ross Atkinson  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

**REVIEW OF DRAFT WASTE DISCHARGE REQUIREMENTS  
FORWARD LANDFILL ORDER NO. R5-2013-XXXX  
SAN JOAQUIN COUNTY, CALIFORNIA**

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The following comments are submitted on behalf of Republic Services Inc. (Republic) on the draft Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (M&RP) that were issued by the Regional Water Quality Control Board – Central Valley Region (RWQCB) on October 23, 2013. Suggested changes in WDR text are italicized.

**WDR**

- 1) Page 3, 11<sup>th</sup> row – Suggest adding FU-13 to the FU-03 to FU-10 row.
- 2) Page 5, Item 17 – Suggest adding *cannery rinsate muds* to the materials that may be air-dried on the bermed, compacted clay pad.
- 3) Page 8, Item 26 – Suggest modifying the first sentence as follows:  
  
*Facility Specification C.7 requires that the Discharger operates the Class II impoundments such that on October 15 of each year a freeboard of at least 4.73 feet and of at least 5.51 feet exists in WMU F-North and WMU F-West, respectively. This corresponds to a two feet freeboard plus the calculated rise in liquid level associated with an average annual storm season.*
- 4) Page 10, Item 35 – Suggest that the words “native soil” be replaced with “*uppermost aquifer*.” This modification will make this item consistent with Page 2, Item 5 of the current WDRs (R5-2003-0049).
- 5) Page 12, Item 49 – Suggest modifying table to include sampling frequency for the wells.

6) Page 13, Item 50 – Suggest modifying the paragraph as follows:

In recent years, lysimeters at new units have not been sampled on a regular basis *due to reasons including a lack of liquid available for sampling*. This Order requires quarterly monitoring of all currently existing and any future lysimeters *if liquid is available*.

7) Page 24, Item 107 – Suggest that the second sentence be modified as follows:

*A Notice of Determination was filed by the RWQCB following Board adoption of these WDRs in accordance with the California Environmental Quality Act (Public Resources Code Section 21000 et seq) and CEQA guidelines (Title 14, section 15000 et seq.)*

8) Page 27, Item 7 – Suggest the following wording is added at the end of the last sentence in the paragraph:

The annual total nitrogen load shall not exceed 300 pounds per acre, *unless a higher loading rate can be justified based on crop uptake*.

9) Page 29, Item 7 – Suggest the sentence be modified as follows:

*The minimum freeboard on October 15<sup>th</sup> of each year shall be 4.73 feet for WMU F-North and 5.51 feet for WMU F-West.*

10) Page 37, Item H – Suggest that the due date for the Compost Facility demonstration report is modified to be subsequent to the date of adoption of these WDRs. Also, the revised composting regulations have not yet been through the final rulemaking process. Therefore, we suggest that the due date for the Compost Facility Demonstration Report be modified to *1 February 2015*.

## **M&RP**

11) Page 2, Item A.1 – There are no background deep zone wells for the Austin Road Unit; suggest changing the status of well AMW-7 to an Austin Road Deep Zone Detection Well. Also, suggest adding the sampling frequency of the wells to this table.

12) Page 3, Item A.1, second paragraph, line 6. Suggest changing “extend” to *extent*.

13) Page 3, Item A.1, fifth paragraph. Suggest changing “Table VI” to *Table VIII*.

14) Page 5, Item A.3 – With the exception of sumps F-North (Forward Pond) and F-West (Austin Pond), leachate collected from the sumps is pumped out to evaporation ponds weekly. The Forward-Pond is the leachate monitoring point for WMU A and WMU D



series sumps, while the Austin-Pond is the leachate monitoring point for WMU FU series sumps. Suggest replacing the monitoring points with the appropriate leachate pond.

15) Page 5, Item A.3, 3rd Paragraph (below the monitoring point table) – Suggest replacing the paragraph as follows:

*All LCRS sumps shall be inspected for the presence of leachate, and total flow and flow rate shall be recorded in accordance with the frequencies listed in Table III. If leachate is detected in a previously dry sump, the discharger shall verbally notify Central Valley Water Board staff within seven days and shall immediately sample and test the leachate for Field and Monitoring Parameters listed in Table III. Leachate samples from the surface impoundments (Forward Pond and Austin Pond) shall be collected for electrical conductivity, pH, Monitoring Parameters, and 5-Year Constituents of Concern in accordance with the frequencies listed in Table III.*

16) Page 7, Item A.5 – Suggest changing “Table II” to *Table VI*.

17) Page 9, Item A.8 – Suggest the following wording is added at the end of the first sentence in the first paragraph:

The Discharger shall collect daily wet weight and weekly composite waste samples from each cannery waste source *unless less frequent composite sampling can be justified.*

18) Page 9, Item A.8 – Suggest the following wording is added to the first sentence of the second paragraph:

Land application areas shall be inspected prior to discharge of putrescible cannery solids and *non-putrescible* rinsate/wastewater, and observations from those inspections shall be summarized for inclusion in the quarterly monitoring reports.

19) Page 10, Item A.9 – Surface impoundments are not listed. Suggest replacing the paragraph as follows:

*Surface impoundments F-North (Forward Pond) and F-West (Austin Pond) shall be monitored for the Parameters listed in Table V. If liquid is present, a sample shall be analyzed for the parameters in Table III.*

20) Page 19, Item C.2. Suggest changing “Table V” to *Table VII*.

21) Page 19, Item C.3, line 6. Suggest changing “Table VI” to *Table VIII*.

22) Page 23, Table I – Since the 5-Year Constituent of Concern sampling was conducted during the first quarter 2013, suggest modifying the reporting frequency for 5-Year Constituents of Concern as follows:

*First quarter 2013 and alternating between first and third quarters every 5 years thereafter.*

23) Page 23, Table I – The 5-Year Constituents of Concern should reference Table VIII. Suggest changing “(see Table VI)” to *(see Table VIII)*.

24) Page 24, Table II – Since the 5-Year Constituent of Concern sampling was conducted during the first quarter 2013, suggest modifying the reporting frequency for 5-Year Constituents of Concern as follows:

*First quarter 2013 and alternating between first and third quarters every 5 years thereafter.*

25) Page 24, Table II – The 5-Year Constituents of Concern should reference Table VIII. Suggest changing “(see Table VI)” to *(see Table VIII)*.

26) Page 25, Table III – Since the 5-Year Constituent of Concern sampling was conducted during the first quarter 2013, suggest modifying the reporting frequency for 5-Year Constituents of Concern as follows:

*First quarter 2013 and alternating between first and third quarters every 5 years thereafter.*

27) Page 25, Table I – The 5-Year Constituents of Concern should reference Table VIII. Suggest changing “(see Table VI)” to *(see Table VIII)*.

28) Page 25, Table III, footnote 1 – Suggest adding a sentence to the beginning of the footnote as follows:

*Leachate from the Forward Pond and Austin Pond (surface impoundments) shall be sampled and analyzed for the Field Parameters, Monitoring Parameters, and 5-Year Constituents of Concern at the frequency provided in Table III.*

29) Page 26, Table IV – Since the 5-Year Constituent of Concern sampling was conducted during the first quarter 2013, suggest modifying the reporting frequency for 5-Year Constituents of Concern as follows:

*First quarter 2013 and alternating between first and third quarters every 5 years thereafter.*

30) Page 26, Table IV – The 5-Year Constituents of Concern should reference Table VIII. Suggest changing “(see Table VI)” to *(see Table VIII)*.

31) Page 27, Table V –Leachate sampling is discussed in Table III, suggest removing Dissolved Oxygen from Field Parameters, or adding it as a quarterly Field Parameter in Table III.

This information has been prepared based on our current understanding of the Forward Landfill and is intended for Republics use in discussions with the RWQCB. Contributors to these comments include GLA, Andrews Engineering, and Herst & Associates. An additional comment letter from Herst & Associates is attached.

If you have any questions regarding this letter, please call me or Erin Fanning of Forward, Inc. at 209.982.4298.

Sincerely,



for Sangeeta Lewis, P.E.  
Lewis Engineering

Encl: Herst & Associates letter





*Global Presence  
Personal Attention*

Ms. Erin Fanning  
Forward, Inc.  
9999 S. Austin Road  
Manteca, California 95336

December 20, 2013

Dear Ms. Fanning:

**Comments on Tentative Waste Discharge Requirements Order No. "R5-2013-XXXX"  
Forward Landfill, Inc. Forward Landfill – Manteca, California**

On October 25, 2013, Mr. Ross Atkinson with the California Regional Water Quality Control Board (RWQCB) Central Valley Region issued via email the tentative Waste Discharge Requirements (WDRs) for the Forward, Inc. Forward Landfill (provisionally designated as "Order No. "R5-2013-XXXX"). The tentative WDRs include a tentative Monitoring and Reporting Program (M&RP) for the facility.

At the request of Forward, Inc., Herst & Associates, Inc. has prepared the following comments on the tentative WDRs. Herst & Associates, Inc.'s comments are limited to those components of the tentative WDRs that address groundwater monitoring of the Forward Landfill's Austin Road Unit (ARU).

**WDRs Page 14, Finding 49 [Austin Road, Shallow Zone, Detection]:** The status of groundwater monitoring wells AMW-13 and AMW-14 is listed as "Detection" in the tentative WDRs. The October 18, 2011 Concentration Limit Update Report prepared by Herst & Associates, Inc. proposed that wells AMW-13 and AMW-14 be re-designated as corrective action monitoring wells based on confirmed inorganic constituent concentration limit (CL) exceedances and/or organic constituent detections at these wells. Given that these wells are located within a constituent plume has already been identified, the groundwater monitoring results from these wells would be most appropriately employed for the evaluation of corrective action progress, rather than monitoring for evidence of a release. The status of AMW-13 and AMW-14 is most appropriately designated as "Corrective Action".

**WDRs Page 14, Finding 49 [Austin Road, Shallow Zone, Corrective Action]:** The status of groundwater monitoring well AMW-5R is listed as "Corrective Action". The October 2011 Concentration Limit Update Report proposed that well AMW-5R be re-designated as a detection monitoring well based on the absence of confirmed inorganic constituent CL exceedances or organic constituent detections at the well in recent years. The status of AMW-5R is most appropriately designated as "Detection".

**WRDs Page 14, Finding 49, Austin Road, Deep Zone:** The status of groundwater monitoring well AMW-7 is listed as "Background". Well AMW-7 is located along the northern boundary of the ARU and is hydrogeologically downgradient of the unit, similar to deep ARU detection monitoring well AMW-6. AMW-7 has not historically exhibited inorganic constituent CL exceedances or organic constituent detections. The status of AMW-7 is most appropriately designated as "Detection".

**M&RP Page 2, Part A.1:** The three previous comments regarding the groundwater monitoring well network summary in Finding 49 of the WDRs are also applicable to the identical summary presented in Part A.1 of the M&RP.

**M&RP Page 20, Part C.4:** The summary of groundwater CLs does not include limits for shallow detection monitoring well AMW-12 or deep detection monitoring well AMW-7. CLs for these two wells were determined and proposed in the October 2011 Concentration Limit Update Report, but these limits are not presented in Section C.4.

Mr. Atkinson with the RWQCB indicated in a December 13, 2013 email that the RWQCB's intention was to not utilize intra-well CLs for the ARU. However, the CL summary presented in the M&RP includes intra-well CLs for wells AMW-2 and AMW-5R. In the interest of consistency, it is recommended that either: A) the proposed intra-well CLs for wells AMW-7 and AMW-12 be included in the M&RP as well; or B) the intra-well CLs for AMW-2 and AMW-5R be removed from the M&RP. It is Herst & Associates, Inc.'s recommendation that the first option be implemented.

If you have any questions or comments, please contact the undersigned at your convenience.

Sincerely,

HERST & ASSOCIATES, INC.



Ward E. Herst, RG  
Managing Partner



Andrew Wyatt  
Senior Environmental Scientist

cc: Sangeeta Lewis – Lewis Engineering